8

9

10

11

GORDON REES, LEP

16

17

18

19

20

21

22

23

24

25

26

27

28

1 MICHAEL T. LUCEY (SBN: 099927) LINDA M. MORONEY (SBN: 172668) 2 MAYA OHANA (SBN: 272903) GORDON & REES LLP 3 275 Battery Street, Suite 2000 San Francisco, CA 94111 4 Telephone: (415) 986-5900 Facsimile: (415) 986-8054 5 Attorneys for Defendant 6 WAL-MART STORES, INC. 7

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

Gnn Doos	e) Case No. C 12-00599 WHO (MEJ)
ER WES	Plaintiff,) JOINT STIPULATION AND (PROPOSED) ORDER TO
TS A1 L	vs.) RESCHEDULE SETTLEMENT) CONFERENCE AND TO MODIFY
Mart Stores, Inc.) SCHEDULING ORDER
EMBARC 275 BATTERY SAN F	Defendant.)))
		,)

The parties hereby stipulate to reschedule the settlement conference in the above matter to Monday, March 10, 2014 at 2:00 p.m. in Magistrate Judge James' chambers, located on the 15th floor of the Federal Building, 450 Golden Gate Avenue, San Francisco, California, 94102.

To allow for a productive settlement conference and to avoid incurring potentially unnecessary fees and costs before said conference, the parties stipulate to a stay of discovery pending completion of the settlement conference.

To further the goal of a productive settlement conference and potential resolution of this matter, and to avoid unnecessary costs, the parties further request an order modifying the Court's scheduling order to require initial disclosures by March 24, 2014. The parties do not request any modification to the remaining dates and deadlines within the Court's scheduling order.

Case 3:12-cv-00599-WHO Document 69 Filed 01/28/14 Page 2 of 2

3 4 5	1	DATED: January 28, 2014	GORDON & REES, LLP	
	2			
	3		By: <u>/s/ Linda M. Moroney</u> LINDA M. MORONEY	
	4		Attorneys for Defendant WAL-MART STORES, INC.	
	5			
	6	DATED: January 28, 2014	Ву:	
	7		JEFFREY N. DALY Attorney for Plaintiff	
	8		GINN ĎOOSE	
LAW OFFICE OF JEROME SCHREIBSTEIN ATTORNEYS AT LAW EMBARCADERO CENTER WEST 275 BATTERY STREET, TWENTIETH FLOOR SAN FRANCISCO, CA 94111 (415) 875-3355 LUD II	9			
	10	IT IS SO ORDERED:		
	11	DATED:	Ву:	
CHREI W WEST IETH FI 4111	12	MEST HETH F	William H. Orrick United States District Judge	
AT LAW AT LAW ENTER I TWENTIE D, CA 94	REES, I	5900 5900		
E OF JEROME (ATTORNEYS AT L RCADERO CENTI RY STREET, TWEI Y FRANCISCO, CA (415) 875-3355	142	ERO C REET, T NCISC(15) 986-		
ATTOL ATTOL ARCAD RRY STI NN FRA (41)	GÓRDON-R	200∀4LED . CO Y 7 (2) CO Y 7 (4) CO Y 7 (4)	Ву:	
W OFFICE AT EMBAR 275 BATTERY SAN I	ან 16	BATTE SA	Maria-Elena James Chief United States Magistrate Judge	
18 19 20 21 22 23		275	Cinci Cinica States Magistrate statge	
			The Settlement Conference shall take place on March 10, 2014 at 2:00 p.m., in Chambers, 15th Floor, before Magistrate Judge James	
			Counsel shall lodge their statements, or if they wish, an updated	
			statements, if they had previously lodged a statement, by March 3, 2014. This Order is signed by Magistrate Judge James	
			for purposes of setting a new settlement date only.	
			Dated: 1/28/2014	
	24			
	25			
	26			
	27			
	28			
1069870/17193047v.			- 2 -	
		-STIPULATION TO RESCHEDULE SETTLEMENT CONFERENCE, STAY DISCOVERY AND REQUEST FOR		

MODIFICATION OF SCHEDULING ORDER